

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

A.S.R., individually and on behalf of all
others similarly situated,

Petitioner–Plaintiff,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, *et al.*,

Respondents–Defendants.

CIVIL ACTION NO. _____

[PROPOSED] TEMPORARY RESTRAINING ORDER

Upon consideration of Petitioner-Plaintiff’s Motion for a Temporary Restraining Order:

Having determined that Petitioner-Plaintiff (“Petitioner”) and the proposed class are likely to succeed on the merits of their claims that the Proclamation violates the Alien Enemies Act (“AEA”), 50 U.S.C. § 21 *et seq.*; that the AEA does not authorize Respondents-Defendants (“Respondents”) to summarily remove them from the United States; that Respondents’ actions implementing removals under the AEA violate due process, the Immigration and Nationality Act, and statutes providing protection for those seeking humanitarian relief; that in the absence of injunctive relief Petitioner and the proposed class will suffer irreparable injury in the form of unlawful removal that may be irreversible; and that the balance of hardships and public interest favor temporary relief, it is, therefore,

ORDERED that Petitioner’s Motion for a Temporary Restraining Order is hereby GRANTED without notice, due to the extreme speed at which removal from this District may occur and the irreparable consequences of the Court’s potential loss of jurisdiction; that the proposed class is provisionally certified; and that Respondents (excluding the President with

respect to any injunctive relief), their agents, representatives, and all persons or entities acting in concert with them are hereby:

1. **ORDERED**, pending further order of this Court, not to remove Petitioner, or any members of the putative class, from the United States under the Presidential Proclamation entitled “Invocation of the Alien Enemies Act Regarding the Invasion of The United States by Tren De Aragua”;
2. **ORDERED**, pending further order of this Court, not to transfer Petitioner, or any members of the putative class, from the District;
3. **ORDERED**, pending further order of this Court, to provide Petitioner and members of the putative class, as well as provisional class counsel, with notice of any designation as an Alien Enemy under the Proclamation, and at least 30 days’ notice prior to any removal pursuant to the Proclamation;
4. **ORDERED**, pending further order of this Court, to provide provision class counsel with notice of the transfer of any individual designated an Alien Enemy under the Proclamation into the District.

It is further **ORDERED** that Petitioners shall not be required to furnish security for costs.

Entered on _____, of April 2025, at _____ a.m./p.m.

United States District Court Judge